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ATTORNEY FOR DEFENDANT JOSEPH DIBEE

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 6:22-cr-00134-AA

vs.

**DECLARATION OF MATTHEW
SCHINDLER IN SUPPORT OF
UNOPPOSED MOTION TO
CONTINUE SENTENCING DATE**

JOSEPH DIBEE,
Defendant(s).

Matthew Schindler, as counsel for defendant Joseph Dibee, does swear under penalty of perjury that the following is true:

1. On June 11, 2020 I was appointed successor counsel to represent Mr. Dibee under the Criminal Justice Act.
2. Mr. Dibee is charged with various federal crimes relating to a series of arsons that took place in the late 1990s and early 2000's.
3. Mr. Dibee has pleaded guilty and sentencing is set for July 27, 2022.
4. The posture of the case, as well as the underlying facts and circumstances are well known to the court.
5. This is a complex case with operative facts dating back twenty years.

6. More time is needed to have time to review any final discovery ordered by the court pursuant to Mr. Dibee's motion to compel.
7. More time is needed to prepare and file objections to the presentence report.
8. The government has no objection to this request.
9. Mr. Dibee requests the court extend his sentencing date 60 days to complete these tasks.

Respectfully submitted under penalty of perjury on July 14, 2022.

s/Matthew Schindler

Matthew A. Schindler, OSB#964190
Attorney for Joseph Dibee